

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Black Hills/ Kansas Gas Utility Company, LLC d/b/a Black Hills Energy, for Approval of the Commission to Make Certain Changes in its Rates of Natural Gas Service.)))))	Docket No. 25-BHCG-298-RTS
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PETITION TO INTERVENE

COMES NOW Seaboard Energy Kansas, LLC ("Seaboard"), and states to the State Corporation Commission of the State of Kansas ("Commission" or "KCC") as follows:

1. On February 3, 2025, Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy ("Applicant") filed an Application requesting a net increase in its revenue requirement of \$17,207,752 rebasing amounts currently collected through the Gas System Reliability Surcharge ("GSRS") of \$4.4 million and adjusting \$1.4 million of the Ad Valorem Tax Surcharge ("AVTS") into base rates.

2. Seaboard is a retail ratepayer and is a direct transportation customer of Applicant. As a direct transportation customer of Applicant, Seaboard has a direct financial interest in this KCC proceeding in that the requested increase in the revenue of Applicant will be charged to retail ratepayers of Applicant, including Seaboard.

Applicable Law

3. 5. K.A.R. 82-1-225. provides in pertinent part: 82-1-225. Intervention. This regulation shall apply to both KAPA and non-KAPA proceedings. (a) The presiding officer shall grant a petition for intervention if the following conditions are met: (1) The petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding

officer's notice of the hearing, at least three days before the hearing. (2) The petition states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law.

4. Seaboard has stated facts herein that support its participation as Intervenor herein in that it has direct financial interests and direct energy policy interests in the Commission's Order in this Docket.

5. All communications and correspondence to Seaboard, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

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CONCLUSION

WHEREFORE, Intervenor respectfully requests that the Commission grant to Seaboard intervention in this KCC Docket.

Respectfully submitted,

/s/ James P. Zakoura

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Attorneys for Seaboard Energy Kansas, LLC

VERIFICATION


STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for Seaboard Energy Kansas, LLC, that he has read and is familiar with the foregoing *Petition to Intervene*, and that the statements therein are true to the best of his knowledge, information, and belief.



James P. Zakoura

SUBSCRIBED AND SWORN to before me this 25th day of April 2025.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April 2025, the above and foregoing was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list and by U.S. Mail as follows:

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